

FY2019 ANNUAL REPORT

Real Alloy Recycling, Inc.

- 2019 Annual Pressure Fall-off Test Plan received on August 19, 2019, with approval from DEQ in a letter dated August 23, 2019.

American Zinc Recycling

- 5-Year MIT Report submitted November 21, 2018, with DEQ approval in a letter dated December 17, 2018.
- Permit Renewal Application received on December 13, 2018.
- DEQ issued an Administrative NOD on the Permit Renewal Application in a letter dated February 22, 2019.
- Response to Administrative NOD received on March 11, 2019.
- Permit Application determined to be administratively complete in a DEQ letter dated March 25, 2019.
- Technical NOD on permit renewal issued by DEQ on June 18, 2019.
- Response to Technical NOD on permit renewal received on August 23 and October 9, 2019.

Mid-Way Environmental Services

- Annual (2018) Static Pressure/Temperature Survey report received on February 4, 2019, with approval from DEQ on February 12, 2019.
- Annual (2018) Pressure Fall-off Test report received on May 21, 2019, with approval from DEQ on June 7, 2019.

OG&E

- OG&E self-reported a loss of continuous monitoring in a letter dated January 25, 2019 due to a lock out tag out to de-energize the programmable logic controls for the injection well pumps to conduct hardware upgrades. No injection occurred during this time. OG&E implemented new procedures to notify DEQ of any anticipated non-compliance due to well maintenance. DEQ sent a notice of non-compliance dated March 22, 2019.
- Minor modification approval dated April 15, 2019 for one-time injection of a 25% glycol/water mixture. The mixture is used in OG&E's cooling lines for the power plant and was being replaced as part of maintenance activities. The mixture went to the 500,000-gallon surface impoundment where it mixed with the wastewater and injected. DEQ approved in a letter dated April 22, 2019.
- 2019 Ambient Pressure Falloff Test report received on June 5, 2019, with approval from DEQ on June 14, 2019.

Pryor Chemical Company

- 2019 Fall-Off Test plan submitted in letter dated February 15, 2019; DEQ approved the plan in a letter dated February 27, 2019.
- 2019 Annual Ambient Pressure Falloff Test report received on April 17, 2019; DEQ responded in a letter dated June 6, 2019.
- Responses to Technical NOD on Permit Renewal Application dated November 9, 2018 and February 21, 2019 submitted to DEQ.

Rulemaking Updates

Amendments to Chapter 653 Aquifer Storage and Recovery (ASR) became effective on September 15, 2019. The amendments updated the definitions of “Aquifer Storage and Recovery” and “Area of Hydrologic Effect” for consistency with the Oklahoma Water Resources Board; provided permit application fees and annual operating fees for ASR; provided for notification requirements for ASR facilities; and, specific language requiring bench-scale and field-scale pilot testing for evaluating the compatibility of delivered water with the receiving aquifer for the purpose of ASR.

TABLE OF IMPORTANT TEST DATES FOR CLASS I INJECTION WELLS

Operator	Injection Well	Fall-off Test	Semi-Annual Internal MIT	5-Year External MIT
Real Alloy Recycling, Inc.	WDW-1	10/16-22/2018	10/11/18, 4/16/19	4/24/15
American Zinc Recycling	WDW-1	NA	10/12/18, 4/23/19	10/26/2018
	WDW-2			
Mid-Way Environmental Services, Inc.	WDW-1	12/19-24/2018	10/10/18, 4/17/19	11/7/2017
OG&E	WDW-1	5/1-3/2019	10/9/18, 4/23/19	5/10/16
Pryor Chemical Company	WDW-1	3/18-22/2019	10/8/18, 4/26/19	3/30-31/15

Summary of Facility Violations
Oklahoma Department of Environmental Quality
Underground Injection Control Program
October 1, 2018 – September 30, 2019

OG&E Energy Corporation
P.O. Box 321
Oklahoma City, Oklahoma 73101-0321
Site located in Newcastle, Oklahoma
Permit#IW-NH-44001-OP

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January 25, 2019	OG&E self-reported a loss of continuous monitoring in a letter dated January 25, 2019 due to a lock out tag out to de-energize the programmable logic controls for the injection well pumps to conduct hardware upgrades. No injection occurred during this time. OG&E implemented new procedures to notify DEQ of any anticipated non-compliance due to well maintenance.
March 22, 2019	DEQ issued a notice of non-compliance for the loss of continuous monitoring. The issue was considered resolved on the date of the letter.
